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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

KELSEY CASCADIA ROSE JULIANA;
XIUHTEZCATL TONATIUH M., through his
Guardian Tamara Roske-Martinez; et al.

Case No.: 6:15-cv-01517-TC

Plaintiffs,

v.

The UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity as
President of the United States; et al.,

**DECLARATION OF JULIA A. OLSON
in Support of Plaintiffs' Motion *In Limine*
Seeking Judicial Notice of Federal
Government Documents**

Defendants.

**DECLARATION OF JULIA A. OLSON IN SUPPORT OF PLAINTIFFS' MOTION
IN LIMINE SEEKING JUDICIAL NOTICE**

I, Julia A. Olson, hereby declare and if called upon would testify as follows:

1. I am an attorney of record in the above-entitled action. I make this Declaration in support of Plaintiffs' Motion *In Limine* Seeking Judicial Notice of Federal Government Documents. I have personal knowledge of the facts stated herein, except as to those stated on information and belief, and if called to testify, I would and could testify competently thereto.
2. Since the commencement of this litigation, counsel for Plaintiffs have been engaged in extensive informal discovery concerning documents available as public records from federal government sources. Counsel for Plaintiffs and our support staff have conducted a significant amount of research from Presidential libraries, government archives, and governmental websites. Many of the documents obtained through this process are relevant to the issues in this case and are properly subject to judicial notice, as suggested by Magistrate Judge Coffin during the June 6, 2018 Status Conference.
3. On behalf of Plaintiffs, I have met and conferred with counsel for Defendants on this procedure. The questions discussed in our meet and confer concerned the following issues in connection with Plaintiffs' response to the Motion for Summary Judgment:
 - (i) Plaintiffs' ability to rely upon Federal Government records that have yet to be authenticated, but which Plaintiffs wish to rely upon in their response; and (ii) declarations from Plaintiffs' experts who have prepared expert reports but are not available to separately prepare declarations by June 28, when Plaintiffs' response is due. As a result of these meet and confer efforts, the parties agreed: (a) Plaintiffs will attach and submit government records that they will Bates stamp and that they rely upon in their response coupled with a request that the Court take judicial notice of those records; and

(b) Plaintiffs will submit short declarations from their experts attaching and authenticating their expert reports.

4. Attached as **Appendix 1-9** to the Motion *In Limine* are tables containing publicly available federal government documents and webpages. Each table has seven columns contain the following information: (1) Exhibit number; (2) Title of the referenced document; (3) Date of the referenced document; (4) Bates number(s) given by Plaintiffs to the referenced document; (5) Source/Author of the referenced document; (6) website url for the referenced document; and (7) the date the referenced document was accessed by Plaintiffs.

5. All of the documents for which Plaintiffs seek judicial notice contain material facts that are relevant to Plaintiffs' claims.

6. True and correct copies of all documents listed in each of the tables that Plaintiffs seek to have judicially noticed are attached to my Declaration as **Exhibits 1-385**.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 28th day of June, 2018.

Respectfully submitted,

/s/ Julia A. Olson
Julia A. Olson